



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

May 21, 2012

H.F. "Chip" Faver
Field Manager Central Oregon Resource Area
3050 N.E. 3rd Street
Prineville, Oregon 97754

RE: EPA Region 10 Comments on the Proposed Resource Management Plan and FEIS for the John Day Basin (EPA Project Number 06-010-BLM).

Dear Mr. Faver:

The U.S. Environmental Protection Agency (EPA) has reviewed the Proposed Resource Management Plan and Final Environmental Impact Statement (FEIS) for the John Day Basin. Our review has been conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The proposed RMP will amend or replace the John Day RMP and portions of the Two Rivers RMP and Baker RMP that guide management of public lands located within the Planning Area. The FEIS analyzes five alternatives, including a no action alternative. Alternative 2 was identified at the draft stage as the Preferred Alternative, and it remains the Preferred Alternative in the final.

In our January 2009 comments on the DEIS, the EPA indicated support for the direction of the Preferred Alternative, though we recommended incorporation of certain elements from Alternative 4. We also sought clarification regarding the use of watershed analysis, and Reserve Forage Allotments (RFAs). Finally, we asked for additional clarity in the Aquatic Conservation Strategy as it relates to proper functioning condition, management of livestock, and water withdrawal.

We appreciate the effort taken by the BLM to address our questions and concerns. We are pleased to note the ongoing role watershed analysis will play in planning and management, and we find the additional information on the management of RFAs to provide helpful clarification. We continue to support the grazing strategy analyzed in Alternatives 3, 4 and 5, as this approach reduces the acres of riparian management areas open to grazing to a greater extent than Alternative 2, and provides a quantifiable, replicable approach to reducing conflicts between grazing and other uses. We recognize, however, that Alternative 2 would reduce acres of RMAs open to grazing by 35%, and that each of the action alternatives is designed to protect and restore aquatic system health. We also find that the Lease Relinquishment Decision Tree in the preferred alternative provides a thoughtful pathway to lease relinquishment where it is appropriate. Overall, while we favor the matrix approach in Alternatives 3-5, we support the proactive approach taken by all of the action alternatives with regard to voluntary lease relinquishment over the No Action alternative.

Finally, we appreciate the discussion of Properly Functioning Condition (PFC), and we are satisfied that the FEIS is crafted to set plan area streams on a path toward PFC. We also appreciate the inclusion of our recommended additions into AQ6 and AQ11 related to livestock management and water withdrawal.

The EPA appreciates the opportunity to comment on the FEIS. If you have any questions regarding our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Teresa Kubo of my staff at (503) 326-2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" being more prominent.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit